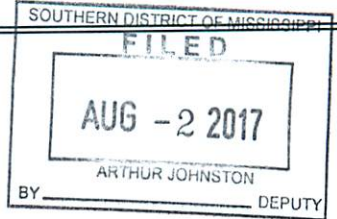


## UNITED STATES DISTRICT COURT

for the

Southern District of Mississippi



United States of America

v.

Alexander Archie, Jr.

Case No. 1:17mj576-RHW

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 31, 2017 in the county of Harrison in the  
Southern District of MS, Southern Division, the defendant(s) violated:

## Code Section

## Offense Description

21 U.S.C § 841(a)(1)

Possession with Intent to Distribute a Controlled Substance, to wit, heroin a schedule II narcotic drug controlled substance.

This criminal complaint is based on these facts:

See affidavit attached hereto and incorporated herein.

☒ Continued on the attached sheet.

Complainant's signature

Robert W. Drace, Task Force Agent, DEA

Printed name and title

Sworn to before me and signed in my presence.

Date: 08/02/2017

Judge's signature

City and state: Gulfport, MS

Robert H. Walker, United States Magistrate Judge

Printed name and title

## **AFFIDAVIT**

I, Robert W. Drace, being a first duly sworn, state as follows:

### **Introduction**

I, Robert W. Drace, am currently serving as a Task Force Agent (TFA) with the United States Department of Justice, Drug Enforcement Administration (DEA). I have been in this capacity since September 2013. Prior to serving as a TFA, I served as a Deputy for the Harrison County Sheriff's Office for over fifteen years with the last six years being assigned to the narcotics division. In my tenure as a law enforcement officer, I have participated in numerous investigations of illegal narcotics trafficking to include violations of Title 21 of the United States Code. Many of the investigations involved the sale, transportation, and distribution of narcotics often leading to arrest and subsequent due process proceedings.

### **Probable Cause Factual Basis**

Your affiant states that on Monday, July 31, 2017, at approximately 2:00 pm, Harrison County Sheriff's Department Narcotics Investigator Justin Ladner learned of suspected heroin distribution in room 315 of the Best Western located at 9475 Highway 49 in Gulfport, Mississippi. Based on this information, investigators with the Harrison County Sheriff's Department Narcotics Division organized an undercover operation where the occupant and registrant of the room, identified as Alexander Archie Jr., was detained after he distributed approximately 3.5 grams of heroin.

Investigators with the sheriff's office, who were conducting surveillance on the hotel room, subsequently secured the room following the aforementioned event and obtained a state of Mississippi search warrant for the hotel room and its contents. A search of the hotel room yielded four additional bags of heroin, plastic sandwich bags, currency and a digital scale all indicative of heroin distribution. These items and heroin were all discovered within the top drawer of the dresser. The heroin from the hotel room was later weighed and had a total gross weight of 78.9 grams excluding the originally seized 3.5 grams bringing the combined total of heroin to 82.4 grams. A preliminary field test was conducted on the suspected heroin that resulted in a presumptive positive reaction for the presence of heroin. Investigators also located nine dosage units of hydrocodone within the hotel room.

Alexander Archie Jr. was then placed under arrest and transported to the Harrison County Sheriff's Department Narcotics Division for further investigation. US Drug Enforcement Administration (DEA) Task Force Agent Robert Drace was then contacted in reference to the findings and responded to assist in the investigation. While at the Harrison County Sheriff's Department Narcotics Division, TFA Drace and Investigator Justin Ladner advised Archie of his rights which he read and signed agreeing to questioning.

In a subsequent interview, Archie related that the onset of his heroin distribution began in November of 2016 due to struggles with college and family cost. Archie related that he has nine

children and saw an opportunity to make money by selling heroin to known associates of his that were addicted to prescription pills. When questioned on his use of heroin and the discovery of hydrocodone pills found in the hotel room, Archie claimed that he does not use heroin and the pills are prescribed to him.

TFA Drace then asked Archie to describe his distribution network detailing information about his source, distribution quantities and pricing. Archie began by stating that he obtains the heroin from a subject in New Orleans East. Archie further related that he obtains two ounces of heroin every ten to fourteen days at a cost of \$2500.00 an ounce. Archie stated that he is often fronted the heroin at no cost and is currently indebted for \$5000.00. Archie also stated that he recently obtained two ounces and possessed a small quantity prior to obtaining the two. When questioned about pricing, Archie related that he averages approximately \$1000.00 a week profit from the sale of heroin and typically sells grams at \$100.00 and "eightballs" at \$250.00.

TFA Drace then asked Archie about the events that led to his arrest. Archie stated that a female friend came to the hotel room to hang out and that she obtained an "eightball" from him. Archie advised that he checked into the hotel room around noon and the only other person that came to the room was the female.

### Conclusion

Based on my experience as a DEA Task Force Agent and the facts listed above involving Alexander Archie Jr., it is my opinion that there is sufficient probable cause to believe that Archie violated Title 21, United States Code, Section 841 (a)(1), possession with intent to distribute heroin.



Robert W. Drace  
Task Force Agent  
Drug Enforcement Administration

Sworn and subscribed to me this 2<sup>nd</sup> day of AUG., 2017.



United States Magistrate Judge